

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE CHANGES, 2012

Docket No. N2012-1

NEWSPAPER ASSOCIATION OF AMERICA  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS DAVID E. WILLIAMS (USPS-T-1) (NAA/USPS-T1-1-14)  
(January 11, 2012)

The Newspaper Association of America ("NAA"), pursuant to rule 26 of the Commission's rules of practice, respectfully submits the following interrogatories, numbered (NAA/USPS-T1-1 through 14) to United States Postal Service witness David E. Williams (USPS-T-1) and requests a timely answer under oath. If an interrogatory can be more accurately answered by a different witness, please redirect to the appropriate witness.

Please contact the undersigned with any questions.

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Certificate of Service

I hereby certify that I have this 11<sup>th</sup> day of January, 2012, caused to be served the foregoing document upon the United States Postal Service and the Public Representative in accordance with sections 12 and 20(c) of the rules of practice.

William B. Baker  
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NAA/USPS-T1-1: Assuming that service standards for Periodicals Mail are revised as described in your testimony, please describe what service standard would apply to a Within-County flats mailing entered at a Destination Delivery Unit in carrier-walk sequenced order and in compliance with all relevant mail preparation requirements.

NAA/USPS-T1-2: Under what circumstances could the mailing described in NAA/USPS-T1-1 receive overnight delivery?

NAA/USPS-T1-3: Assuming that service standards for Periodicals Mail are revised as described in your testimony, please describe what service standard would apply to an Outside-County flats mailing entered at the Destination Delivery Unit in carrier-walk sequenced order and in compliance with all relevant mail preparation requirements.

NAA/USPS-T1-4: Under what circumstances could the mailing described in NAA/USPS-T1-3 receive overnight delivery?

NAA/USPS-T1-5: Assuming that service standards for Periodicals Mail are revised as described in your testimony, are there any circumstances in which a Within County Periodicals mailing that properly claims an SCF Destination Entry Discount could receive overnight delivery? If so, please explain those circumstances.

NAA/USPS-T1-6: Assuming that service standards for Periodicals Mail are revised as described in your testimony, are there any circumstances in which an Outside-County

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Periodicals mailing that properly claims an SCF Destination Entry Discount could receive overnight delivery? If so, please explain those circumstances.

NAA/USPS-T1-7: Assuming that service standards for Periodicals Mail are revised as described in your testimony, under what circumstances could a Within County Periodicals mailing entered at a Business Mail Entry Unit receive overnight delivery?

NAA/USPS-T1-8: Assuming that service standards for Periodicals Mail are revised as described in your testimony, under what circumstances could an Outside-County Periodicals mailing entered at a Business Mail Entry Unit receive overnight delivery?

NAA/USPS-T1-9: Would the Periodicals mailings described in your responses to NAA/USPS-T1-7 and NAA/USPS-T1-8 be eligible for destination entry discounts? If yes, please identify what destination entry discounts would be available.

NAA/USPS-T1-10: Assuming that service standards are revised as described in your testimony, would there be any changes to the service standard currently applicable to a Standard High-Density flats mailing entered at a Destination DDU? If so, please describe the explain those circumstances.

NAA/USPS-T1-11: Assuming that service standards are revised as described in your testimony, would there be any changes to the service standard currently applicable to

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a Standard High-Density flats mailing entered at a Destination SCF? If so, please describe the explain those circumstances.

NAA/USPS-T1-12: Assuming that service standards are revised as described in your testimony, would there be any changes to the service standard currently applicable to a Standard Saturation flats mailing entered at a Destination DDU? If so, please describe the explain those circumstances.

NAA/USPS-T1-13: Assuming that service standards are revised as described in your testimony, would there be any changes to the service standard currently applicable to a Standard Saturation flats mailing entered at a Destination SCF? If so, please describe the explain those circumstances.

NAA/USPS-T1-14: Please refer to page 24, line 20 of your testimony. Please confirm that you intended to use the word “not” between “locations” and “requiring.” If you cannot confirm, please explain why not.